

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. H-4:19-cr-00234-78
	§	
STEVEN PAUL FERREL,	§	
	§	
Defendant.	§	
_____	§	

**THE UNITED STATES OF AMERICA’S (“UNITED STATES”)
MOTION TO DISMISS THE REMAINING COUNTS IN THE INDICTMENT**

On September 9, 2024, the parties and the Court entered into a plea agreement, in which, in pertinent part, the parties agreed that in exchange for Defendant pleading guilty to Count 1 of the Indictment, the United States would move to dismiss the remaining counts in the Indictment against this Defendant following sentencing.

On January 6, 2025, sentencing will have concluded in this matter. Accordingly, the United States moves, in conjunction with the Plea Agreement and Fed. R. Crim. P. 11(c)(1)(A), to dismiss Counts 42, 49, 90, 100, 142, 152, and 194 of the Indictment against this Defendant once sentencing is concluded.

Date: January 4, 2025

Respectfully submitted,

ALAMDAR S. HAMDANI
United States Attorney, Southern District of Texas

By: s/ Adam Laurence Goldman
Adam Laurence Goldman
Assistant United States Attorney
Attorney-in-Charge
S.D. Tex. ID No.: 1034195
State Bar Nos.: NY3038023/DC476521
1000 Louisiana Street, 24th Floor
Houston, Texas 77002
Tel.: (713) 567-9534; FAX: (713) 718-3303
E-mail: Adam.Goldman2@usdoj.gov
Counsel for the United States of America

CERTIFICATE OF CONFERENCE AND SERVICE

I HEREBY CERTIFY that on this 4th day of January, 2025, I filed this document with the Court and provided a copy to opposing counsel listed below, who conferred during the plea that she is unopposed to the instant motion:

Equator L. Turner
440 Louisiana Street, Suite 900
Houston, Texas 77002
Tel.: 713-533-1234
Email: equator@turner-lawfirm.com

s/ Adam Laurence Goldman
Adam Laurence Goldman
Assistant United States Attorney